

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DONQUARION LEWIS; KE'AUJANAA  
SHEPHERD-FRIDAY; and K.B., by and  
through her parent and next friend, H.B.,

Plaintiffs,

v

MICHIGAN DEPARTMENT OF  
EDUCATION,

Defendant.

Case No. 22-cv-00838-RJJ-PJG

Hon. ROBERT J. JONKER

Mag. PHILLIP J. GREEN

**STIPULATION AND ORDER  
GRANTING LEAVE TO FILE  
EXHIBITS UNDER SEAL**

---

Erin H. Diaz (P80388)  
Mitchell D. Sickon (P82407)  
Disability Rights Michigan  
Attorneys for Plaintiffs  
4095 Legacy Parkway  
Lansing, Michigan 48911  
(517) 487-1755  
ediaz@drmich.org  
msickon@drmich.org

Jennifer B. Salvatore (P66640)  
David L. Fegley (P85275)  
Salvatore Prescott Porter & Porter  
Attorneys for Plaintiffs  
105 E. Main Street  
Northville, Michigan 48167  
(248) 679-8711  
salvatore@sppplaw.com  
fegley@sppplaw.com

Elizabeth K. Abdnour (P78203)  
Abdnour Weiker LLP  
Attorney for Plaintiffs  
325 E. Grand River Ave., Ste. 250  
East Lansing, MI 48823  
(517) 994-1776  
liz@education-rights.com

---

---

Jacquelyn N. Kmetz (P83575)  
MI AECRES  
Attorney for Plaintiffs  
P.O. Box 705  
Ludington, Michigan 49431  
(231) 794-2379  
jkmetz@miaecres.org

Kathleen A. Halloran (P76453)  
Neil Giovanatti (P82305)  
Ticara D. Hendley (P81166)  
Attorneys for Defendant  
Michigan Department of  
Attorney General  
Health, Education & Family  
Services Division  
P.O. Box 30758  
Lansing, MI 48909  
(517) 335-7603  
hallorank1@michigan.gov  
giovanattin@michigan.gov  
hendleyt1@michigan.gov

**STIPULATION AND ORDER GRANTING LEAVE TO FILE EXHIBITS  
UNDER SEAL**

Defendant intends to file three confidential settlement agreements between Plaintiffs and local school districts as exhibits in support of its motion for summary judgment. Plaintiffs, through their counsel, requested that these settlement agreements be filed under seal pursuant to the Protective Order, dated June 16, 2023 (PageID.268-281). Defendant do not object to filing these agreements under seal. Pursuant to Local Civil Rule 10.6(a), sealing a document containing truly confidential information is appropriate. Here, the identified exhibits are confidential to protect the privacy interests of Plaintiffs and to encourage good faith negotiation and settlement of claims.

Good cause having been shown, the parties stipulate and the Court hereby ORDERS that Defendant may file the three confidential settlement agreements as exhibits to their forthcoming motion for summary judgment under seal pursuant to Local Civil Rule 10.6 and Federal Rule of Civil Procedure 5.2(d).

IT IS SO ORDERED.

Dated: February 6, 2025

\_\_\_\_\_  
HON. ROBERT J. JONKER  
United States District Court Judge

Respectfully submitted,

/s/ Mitchell D. Sickon (with consent)  
Mitchell D. Sickon (P82407)  
Attorney for Plaintiffs

/s/ Kathleen A. Halloran  
Kathleen A. Halloran (P76453)  
Attorney for Defendant